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May 14, 2014

United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

Attn: Vernon S. Broderick, United States District Judge

Re: SMG, an infant by his parents and natural guardian ATAVIA MOORER
v. SCO FAMILY OF SERVICES, et al
Index #: 1:14-cv-00815- (VSB) (SN)


Dear Justice Broderick:

This firm represents the defendants SCO Family of Services, Darlene Ellison, Gail Nayowith, John Roe and Jane Doe in this matter. The parties agreed on a Case Management Order in which Rule 26 disclosures would be exchanged by May 15, 2014. The confidential foster care case file I will be exchanging is somewhat voluminous and requires redaction. This process is extremely time consuming. I have advised the parties that I would be requesting additional time in which to comply and will endeavor to disclose the records on a rolling basis as portions of the redaction is completed. I am requesting an extension of time to provide initial Rule 26 disclosure to May 30, 2014.

At our initial conference we agreed that the parties would engage in some limited discovery with a view toward possible early settlement. The Court scheduled another conference for June 19, 2014. I apologize in advance but my request for an extension may delay this process slightly. If the Court is inclined to adjourn the June 19, 2014 conference and re-schedule it, kindly be advised I will be on vacation from July 4, 2014 through July 21, 2014.

Thank you for your courtesies in this matter. I will await your instruction.

Very truly yours,


Robert S. Delmond (RSD 9724)

